



UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
NEW YORK REGIONAL OFFICE  
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NEW YORK, NEW YORK 10281-1022

WRITER & DIRECT DIAL

JOHN O. ENRIGHT  
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September 4, 2018

**Via ECF**

The Honorable Madeline Cox Arleo  
United States District Judge  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, NJ 07101

**Re: SEC v. Parmar et al., 2:18-cv-09284-MCA-MAH**

Dear Judge Arleo:

I write on behalf of plaintiff Securities and Exchange Commission (the "Commission") and pursuant to L. Civ. R. 7.1(d)(5) to seek an extension to oppose defendant Parmjit (Paul) Parmar's August 16, 2018 motion to dismiss the Commission's complaint dated May 16, 2018 under Fed. R. Civ. P. 12(b)(6), 12(b)(7), and 19 (the "Motion to Dismiss"). (ECF Nos. 12-13.)

On August 22, 2018, the Clerk's Office set a motion day for the Motion to Dismiss of September 17, 2018. (ECF Aug. 22, 2018 Minute Entry.) On August 28, 2018, the Commission filed a letter with the Court pursuant to L. Civ. R. 7.1(d)(5) that adjourned the motion day from September 17 to October 1, 2018 by right. (ECF No. 14.) Accordingly, the Commission's opposition papers to the Motion to Dismiss are currently due on September 17, 2018 and Parmar's reply papers, if any, are due on September 24, 2018.

On August 31, 2018, the U.S. Attorney's Office filed a "Motion of the United States for Leave to Intervene and for a Stay" ("Stay Motion"). (ECF No. 15.) In light of the U.S. Attorney's Office's Stay Motion, the Commission respectfully requests that the motion day for the Motion to Dismiss be adjourned until the Court has decided the Stay Motion. If the Stay Motion is denied, the Commission respectfully requests that the Court set a new motion day that would give the Commission thirty days to file its opposition papers.

I have conferred with counsel for Parmar, who consents to this request. I have not conferred with defendants Sotirios (Sam) Zaharis and Ravi Chivukula, as neither has appeared in this action.

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I am available to discuss this matter at the Court's convenience.

Respectfully submitted,

s/ John O. Enright  
John O. Enright  
Senior Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on September 4, 2018, the undersigned served true and correct copies of the Commission's Letter dated September 4, 2018 on counsel for defendant Parmjit (Paul) Parmar and defendant Ravi Chivukula by the following means:

Timothy Charles Parlatore, Esq.  
Parlatore Law Group  
221 River Street, 9th Floor  
Hoboken, NJ 07030  
(via ECF)

Ravi Chivukula  
765 Banyan Court  
Morganville, NJ 07751  
(via UPS Overnight Delivery)

By: s/ John O. Enright  
John O. Enright  
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